IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

)
FEDERAL TRADE COMMISSION,)
Plaintiff,) Case No. 03-C-3904
v.) Hon. Robert W. Gettleman
KEVIN TRUDEAU,)
Defendant,)
THE LAW OFFICES OF MARC LANE, PC,)
TC,)
Respondent.)
- -)
)

MOTION TO COMPEL THE LAW OFFICES OF MARC LANE TO DISCLOSE INFORMATION REGARDING TRUDEAU'S ASSET PROTECTION PLAN

MOTION TO COMPEL THE LAW OFFICES OF MARC LANE TO DISCLOSE INFORMATION REGARDING TRUDEAU'S ASSET PROTECTION PLAN

Pursuant to Federal Rules 37, 45 and 69, and Paragraph XVI of the Stipulated Final Order (Sept. 3, 2004) (DE56), Plaintiff Federal Trade Commission ("FTC") moves to compel Respondent Law Offices of Marc Lane ("Lane") to disclose all information responsive to the FTC's 30(b)(6) subpoena seeking documents and testimony concerning Trudeau's asset protection plan. The accompanying brief supports this motion.

Dated: April 15, 2013

David O'Toole (dotoole@ftc.gov) Federal Trade Commission 55 West Monroe Street, Suite 1825 Chicago, Illinois 60603-5001 Phone: (312) 960-5601

Fax: (312) 960-5600

Respectfully Submitted,

/s/ Jonathan Cohen Michael Mora (mmora@ftc.gov)
Jonathan Cohen (jcohen2@ftc.gov)
Federal Trade Commission 600 Pennsylvania Ave., N.W. M-8102B Washington, DC 20580 Phone: 202-326-3373; -2551

Fax: 202-326-2558

CERTIFICATE OF SERVICE

I, Jonathan Cohen, hereby certify that on April 15, 2013, I caused to be served true copies of the foregoing by electronic means, by filing such documents through the Court's Electronic Case Filing System, which will send notification of such filing to:

Kimball Richard Anderson kanderson@winston.com

Thomas Lee Kirsch, II tkirsch@winston.com

Katherine E. Croswell kcroswell@winston.com

Daniel J. Donnellon ddonnellon@ficlaw.com

Kenjiro D. LeCroix klecroix@ficlaw.com

Patrick E. Deady ped@hmlaw.com

Evan J. Haim ejh@hmlaw.com

/s/ Jonathan Cohen Jonathan Cohen (jcohen2@ftc.gov) Attorney for Plaintiff Federal Trade Commission